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Attorney for Plaintiff

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, SANTA ANA DIVISION**

In re	)	CASE NO. 8:21-bk-10525-ES
	)	
The Source Hotel, LLC,	)	Chapter 11
	)	
Debtor.	)	
		) CREDITOR CERTIFIED TILE, INC.'S
		) JOINDER IN OBJECTION OF CREDITOR
		) ARAGON CONSTRUCTION, INC.'S TO
		) DEBTOR'S MOTION FOR ENTRY OF
		) ORDER: (1) AUTHORIZING SALE OF
		) SUBSTANTIALLY ALL OF THE
		) DEBTOR'S ASSETS; (2) AUTHORIZING
		) THE DEBTOR'S: ASSUMPTION AND
		) ASSIGNMENT OF GROUND LEASE AND
		) DETERMINING CURE AMOUNT; (3)
		) WAIVING THE 14-DAY STAY PERIODS
		) SET FORTH IN THE BANKRUPTCY
		) RULES 6004(H) AND 6006(D); AND (4)
		) GRANTING RELATED RELIEF

DATE: September 30, 2021  
TIME: 2:00pm  
PLACE: Zoom Gov

Certified Tile, Inc., (Certified) is a creditor of the Bankrupt, having provided contracting services for the benefit of the Debtor. Certified filed a Mechanic's Lien and filed suit in State Court to enforce same in Orange County Superior Court case no. 30-2020-01143824-CU-CL-CJC. On May 17, 2021, Certified filed its Proof of Claim. Certified joins with Aragon Construction, Inc.'s Objection to Debtor's Motion for Entry of Order: 1) Authorizing sale of substantially all of the Debtor's Assets free and clear of all liens and encumbrances; 2) Authorizing the Debtor's Assumption and Assignment of Ground Lease, 3) Waiving the 14-Day Stay Periods Set Forth in the Bankruptcy Rules 6004(H) and 6006(D);

And Granting Related Relief.

DATED: September 29, 2021

LAW OFFICE OF MICHAEL N. BERKE

*Michael N. Berke*

MICHAEL N. BERKE, Attorney for Plaintiff

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
The Law Office of Michael N. Berke, 25001 The Old Road, Santa Clarita, CA 91381

A true and correct copy of the foregoing document entitled (*specify*): CREDITOR CERTIFIED TILE, INC.'S JOINDER IN OBJECTION OF CREDITOR ARAGON CONSTRUCTION, INC.'S TO DEBTOR'S MOTION FOR ENTRY OF ORDER: (1) AUTHORIZING SALE OF SUBSTANTIALLY ALL OF THE DEBTOR'S ASSETS; (2) AUTHORIZING THE DEBTOR'S ASSUMPTION AND ASSIGNMENT OF GROUND LEASE AND DETERMINING CURE AMOUNT; (3) WAIVING THE 14-DAY STAY PERIODS SET FORTH IN THE BANKRUPTCY RULES 6004(H) AND 6006(D); AND 94) GRANTING RELATED RELIEF

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 9-29-2021, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Ron Bender, Esq. rb@lnbyb.com

Raymond B. Kim, Esq. rkim@mdjalaw.com Clayton T. Tanaka, Esq.  
clay.tanaka@gmail.com

☐ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On (*date*) \_\_\_\_\_, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) 9-29-2021, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Via Overnight mail:

Honorable Erithe A. Smith

United States Bankruptcy Court Central District of California

Ronald Reagan Federal Building and Courthouse

411 West Fourth Street, Suite 5040/Courtroom 5A

Santa Ana, CA 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Date 9-29-2021

Printed Name Michelle DeVan

Signature /s/

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.